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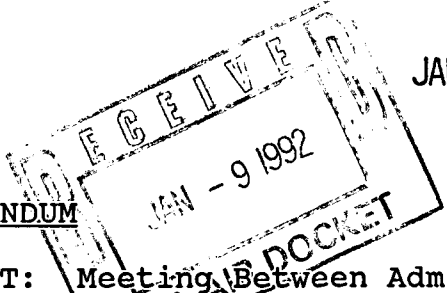
Docket Number:

A-91-46



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

A-91-46
IV-E-10



JAN 9 1992

OFFICE OF
GENERAL COUNSEL

MEMORANDUM

SUBJECT: Meeting Between Administrator Reilly and Ethyl Corporation Representatives

FROM: *Nancy Ketcham-Corwill*
Nancy Ketcham-Corwill
Assistant General Counsel
Air and Radiation Division, LE-132A

TO: Docket A-91-46

On January 7, 1992, Administrator William K. Reilly, Deputy Administrator F. Henry Habicht II, and other EPA officials met with several Ethyl Corporation representatives (Ethyl) at the latter's request to discuss Ethyl's request under section 211(f)(4) of the Clean Air Act for a waiver allowing the sale of MMT, a gasoline octane enhancer. Under section 211(f)(4), Administrator Reilly was required to decide whether to grant the waiver request by January 8, 1992.

At the meeting, Ethyl representatives voiced their concerns that Administrator Reilly was rumored to be leaning against the waiver request and sought to address any concerns the Administrator might have with the potential use of MMT in unleaded gasoline. The Ethyl representatives reviewed what Ethyl had done in support of its waiver request, including extensive and costly testing and analyses of MMT's potential effects on vehicle emissions, public health, ozone, refinery operations, and crude oil use.

Administrator Reilly indicated his concerns with MMT's potential to plug vehicles with catalytic converters and with resulting increases in vehicle emissions and recall liability for automakers. Administrator Reilly and Ethyl representatives then engaged in a discussion of evidence in the decision-making record (dockets A-91-46 and A-90-16) regarding catalyst plugging and emissions increases. Ethyl representatives asserted that the weight of the evidence in the record left little or no reasonable concern with catalyst plugging, and in support of that assertion repeated the points they had made in their submissions to the dockets. Ethyl representatives closed the meeting with assurances that if the waiver were granted Ethyl would continue testing MMT's effects to address any lingering concerns and that they believed MMT would produce environmental benefits.